



*Leaders in Recycling*

June 20, 2012

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Re: PCB Inventory, Accounting for PCBs and Request of Sale

I would like to take this chance to thank you again for our meeting on June 11, 2012. Per our conversation the ORRCO staff and I have worked diligently to put together the information I am sending attached to this letter. I hope that it finds you well.

Included with this letter are three documents. The first is ORRCO's final PCB inventory and a summary of the calculations. The second is a document titled "Accounting for PCB material from Burly Seal Utah" and the third is the request for sale of Anacortes locked down used oil. The supporting analyticals will be mailed to you in hardcopy form.

If you should have any questions about these documents please do not hesitate to contact me.

Regards,

Bill Briggs  
President  
Oil Re-Refining Company

## Summary of ORRCO's PCB Inventory

This summary describes the attached calculation sheets. There are two calculation sheets, the first is the inventory of used-oil with detected PCBs prior to any product transfers and the second is the current inventory. This summary is intended to explain how oil volumes have changed since the discovery of PCBs.

### Inventory prior to any transfers

#### Volume of Oil with Detected Levels Affected by Burly Seals

The first section titled "Detect Levels of oil affected by Burly Seals" is exactly that. All tanks that contained a detected level of PCBs are included in this section. The only tank that is not included is Tank 1 at EMRI. The reason for this is because it was contaminated by another source, at which point Mike Mazza hired a contractor and cleaned this tank on his own.

The totals from the three sites, EMRI, Salt Lake City (SLC) and IOI added together yields the total volume of PCB material with a detectable limit above 2 ppm.

EMRI	242,640	gal
SLC	15,500	gal
IOI	<u>59,059</u>	gal
Total	317,199	gal

#### Volume of Non-Detect Oil Locked Down

The second section contains the inventory for under 2 ppm PCB material. The totals from the five sites, EMRI, FPI, SLC, IOI and Venoil added together will yield the total volume of PCB material under 2 ppm.

EMRI	33,281	gal
FPI	44,547	gal
IOI	100,871	gal
Venoil	55,145	gal
SLC	<u>16,500</u>	gal
Total	250,344	gal

### **Volume of Oil with Detected Levels Affected by Pacific Recycling**

This section breaks down the over 2 ppm of PCB material received from Pacific Recycling at the ORRCO – Goshen facility.

Goshen	<u>19,403</u>	gal
Total	19,403	gal

### **Volume of Non-Detect Levels at Goshen**

This section breaks down the under 2 ppm of PCB material thought to be affected by Pacific Recycling at the ORRCO – Goshen facility.

Goshen	<u>17,527</u>	gal
Total	17,527	gal

### **Volume of Oil with Detected Levels Affected by Sutton Salvage**

This section breaks down the over 2 ppm of PCB material thought to be affected by Sutton Salvage at the ORRCO – Spokane facility.

Spokane	<u>16,613</u>	gal
Total	16,613	gal

The three contaminated tanks in the ORRCO – Spokane facility all test over 2 ppm. These three tanks are tank 1, 3 and 4.

### **Volume Total**

Total Volumes of Detected PCBs	353,215	gal
Total Volumes of Non-Detect PCBs	<u>267,871</u>	gal
Total Volumes	Total 621,086	gal

### **Solids**

EMRI	4,675	gal
FPI	3,520	gal
IOI	<u>1,650</u>	gal
Total Solids	Total 9,845	gal

## Totals

Total Volume	621,086	gal
Total Solids	<u>9,845</u>	gal
Grand Total of PCB Material	Total 630,931	gal

## Current Inventory

The Current Inventory Sheet depicts what has happened since a truck load was hauled to Clean Harbors for incineration, several truck loads were hauled from EMRI to FPI, the sale of some material and the barrels of solids were all transferred to FPI. Considering all of these events, the Current Inventory sheet shows where the product resides at this time.

## Volume of Oil with Detected Levels Affected by Burly Seals

Tank 12 at EMRI has had 4926 gallons pulled from it and transferred over to FPI. This product was used to top off tanks 20, 21 and 22 at the FPI facility.

Tank 12	193,884	gal
	<u>4,926</u>	gal
Total	188,958	gal

After this transfer the tank and its contents have been sold. The amount of 188,958 will come into consideration again shortly.

The inventory of over 2 ppm PCBs at the Salt Lake City (SLC) facility has not changed since the original inventory was taken.

Tank 26	<u>15,500</u>	gal
Total	15,500	gal

The inventory of over 2 ppm PCBs at the Klamath Falls facility (IOI) has not changed since the original inventory.

Tank 4	17,305	gal
Tank 5a	13,775	gal
Tank 6a	13,979	gal
Tank D3	<u>14,000</u>	gal
Total	59,059	gal

Tank 31 at the EMRI facility was hauled off to Clean Harbors in Utah to be incinerated. This load contained 9,844 gallons of product. Shortly after this, tank 2 at EMRI was transferred into tank 31. Tank 1 at EMRI was cleaned out by Mike Mazza. At the same time tank 1 was being cleaned out, ORRCO had tank 2 cleaned out. Tank 1 is not included in this inventory due to the fact that it was handled by Mike Mazza which was caused by a separate contamination.

Tank 31 sent to Clean Harbors	<u>9,844</u>	gal
Total	9,844	gal

Tanks 20, 21, 22, 28 and 29a at the FPI facility were all used to store the transferred material from the EMRI facility.

Tank 20	11,413	gal
Tank 21	11,267	gal
Tank 22	10,973	gal
Tank 28	19,145	gal
Tank 29a	<u>18,917</u>	gal
Total	71,715	gal

The total volume of over 2 ppm PCB material affected by Burly Seals is as follows:

EMRI	188,958	gal
Incinerated	9,844	gal
SLC	15,500	gal
IOI	59,059	gal
FPI	<u>71,715</u>	gal
Total	345,076	gal

The total volume of over 2 ppm PCBs affected by Burly Seal that ORRCO still needs to dispose of is:

Total	345,076	gal
EMRI (less)	188,958	gal
Incinerated (less)	<u>9,844</u>	gal
Total	146,274	gal

## Volume of Non-Detect Oil Locked Down

The difference in the Non-Detect Volume is easily explained. Both tank 2 and tank 6 at the EMRI facility were tested at under 50 ppm. When the product was transferred to the FPI facility there was not enough capacity to move each individual tank into its own individual tank. So, some tanks were topped off. Consequently there appears to be less product of non-detect, when in all actuality there is still just as much product under 50 ppm. Later test results show the concentration levels of these tanks. Because tanks 2 and 6 at EMRI were never tested for an exact amount of PCB concentration, the below 50ppm was used as a non-detect level in the original inventory prior to any transfers. The product has since been added to the appropriate location and accounted for.

### Non-Detect Levels Prior to Transfers

EMRI	33,281	gal	<50
FPI	44,547	gal	<2
IOI	100,871	gal	<2
Venoil	55,145	gal	<2
SLC	<u>16,500</u>	gal	<2
Total	250,344	gal	

### Detect Levels Current Inventory

EMRI (less)	(33,281)	gal	>2
FPI	44,547	gal	<2
IOI	100,871	gal	<2
Venoil	55,145	gal	<2
SLC	<u>16,500</u>	gal	<2
Total	217,063	gal	

## Volume of Oil with Detected Levels Affected by Pacific Recycling

No transfers of product took place at the ORRICO – Goshen facility

## Volume of Non-Detect Oil at Goshen

No transfers of product took place at the ORRICO – Goshen facility.

## Volume of Oil with Detected Levels Affected by Sutton Salvage

No transfers of product took place at the ORRICO – Spokane facility.

## Volume Total

Total Volume of Detected PCBs	381,092	gal
Total Volume of Non-Detect PCBs	<u>234,590</u>	gal
Total Volume (less solids)	Total 615,682	gal

## Solids

FPI	<u>15,773</u>	gal
Total Solids	Total 15,773	gal

## Totals

Total Volume of Liquids	615,682	gal
Total Volume of Solids	<u>15,773</u>	gal
Grand Total of PCB Material	Total 631,455	gal

## Difference

Total Material Prior to Transfers	630,931	gal
Total Material Current Inventory	<u>631,455</u>	gal
Difference (Plus)	Total 524	gal

## Inventory prior to any transfers

### Volume of Oil with Detected levels Affected by Burly Seals

EMRI	Tank	Gallons	Detect Level
	5	19,132	31
	12	193,884	7.1
	13	18,496	90
	31	<u>11,128</u>	80.9
Total		242,640	

SLC	Tank	Gallons	Detect Level
	26	<u>15,500</u>	33.4
Total		15,500	

IOI	Tank	Gallons	Detect Level
	4	17,305	7
	5a	13,775	9.6
	6a	13,979	74
	D3	<u>14,000</u>	17
Total		59,059	

**Grand Total**                      317,199

### Volume of Non-Detect Oil Locked Down

EMRI	Tank	Gallons	Detect Level
	2	15,895	<50
	6	<u>17,386</u>	<50
Total		33,281	

FPI	Tank	Gallons	Detect Level
	6	24,718	<2
	29	<u>19,829</u>	<2
Total		44,547	

IOI	Tank	Gallons	Detect Level
	3	12,506	<2
	5b	17,304	<2
	6b	8,278	<2
	7a	17,931	<2
	16a	21,844	<2
	16b	20,508	<2
	L2	<u>2,500</u>	<2
Total		100,871	



Venoil	Tank	Gallons	Detect Level
	B4	17,491	<2
	B7	17,452	<2
	B9	<u>20,202</u>	<2
Total		55,145	

SLC	Tank	Gallons	Detect Level
	27	<u>16,500</u>	<2
Total		16,500	

**Grand Total** 250,344

#### **Volume of Detected Levels Affected by Pacific Recycling**

Goshen	Tank	Gallons	Detect Level
	1	<u>19,403</u>	160
Total		19,403	

**Grand Total** 19,403

#### **Volume of Non-Detect Levels at Goshen**

Goshen	Tank	Gallons	Detect Level
	3	8,227	<2
	Green	2,800	<2
	White	<u>6,500</u>	<2
Total		17,527	

**Grand Total** 17,527

#### **Volume of Oil with Detected Levels Affected by Sutton Salvage**

Spokane	Tank	Gallons	Detect Level
	1	5,975	3.1
	3	3,255	51
	4	<u>7,383</u>	21
Total		16,613	

**Grand Total** 16,613

#### **Volume Total**

Total Detect	353,215
Total Non-Detect	<u>267,871</u>
Total Gallons	<u><u>621,086</u></u>

**Solids**

EMRI	Container	Gallons
	Totes (3)	1650
	Brls (55)	<u>3025</u>
Total		4675

FPI	Container	Gallons
	Brls (64)	<u>3520</u>
Total		3520

IOI	Container	Gallons
	Brls (30)	<u>1650</u>
Total		1650

Total Solids	9845
Total Gallons	<u>621,086</u>
	630,931

## Current Inventory

### Volume of Oil with Detected levels Affected by Burly Seals

EMRI	Tank	Gallons	Detect Level
	12	<u>188,958</u>	7.1
Total		188,958	

Incinerated	Tank	Gallons	Detect Level
	31	<u>9,844</u>	80.9
Total		9,844	

SLC	Tank	Gallons	Detect Level
	26	<u>15,500</u>	33.4
Total		15,500	

IOI	Tank	Gallons	Detect Level
	4	17,305	7
	5a	13,775	9.6
	6a	13,979	74
	D3	<u>14,000</u>	17
		59,059	

FPI	Tank	Gallons	Detect Level
	20	11,413	59.1
	21	11,267	49.94
	22	10,973	20.9
	28	19,145	5.28
	29a	<u>18,917</u>	5.04
Total		71,715	

**Grand Total** 345,076

### Volume of Non-Detect Oil Locked Down

FPI	Tank	Gallons	Detect Level
	6	24,718	<2
	29	<u>19,829</u>	<2
Total		44,547	

IOI	Tank	Gallons	Detect Level
	3	12,506	<2
	5b	17,304	<2
	6b	8,278	<2
	7a	17,931	<2
	16a	21,844	<2

	16b	20,508	<2
	L2	<u>2,500</u>	<2
Total		100,871	

Venoil	Tank	Gallons	Detect Level
	B4	17,491	<2
	B7	17,452	<2
	B9	<u>20,202</u>	<2
Total		55,145	

SLC	Tank	Gallons	Detect Level
	27	<u>16,500</u>	<2
Total		16,500	

**Grand Total** 217,063

#### Volume of Detected Levels Affected by Pacific Recycling

Goshen	Tank	Gallons	Detect Level
	1	<u>19,403</u>	160
Total		19,403	

**Grand Total** 19,403

#### Volume of Non-Detect Levels at Goshen

Goshen	Tank	Gallons	Detect Level
	3	8,227	<2
	Green	2,800	<2
	White	<u>6,500</u>	<2
Total		17,527	

**Grand Total** 17,527

#### Volume of Oil with Detected Levels Affected by Sutton Salvage

Spokane	Tank	Gallons	Detect Level
	1	5,975	3.1
	3	3,255	51
	4	<u>7,383</u>	21
Total		16,613	

**Grand Total** 16,613

#### Volume Total

Total Detect 381,092

Total Non-Detect	<u>234,590</u>
Total Material	<u><u>615,682</u></u>

**Solids**

FPI	Container	Gallons
	Totes(15.25)	6863
	Brls (162)	<u>8910</u>
Total		15773

Total Solids	15773
Total Gallons	<u>615,682</u>
	631,455

Difference	631,455
	<u>630,931</u>
	524

plus

# Accounting for all PCB Material from Burly Seal Utah

ppm divided by 1 million gives the percent of PCBs. Percent of PCBs multiplied by the gallons gives the total gallons of PCBs

## Initial source

PPM	20,800
Millions	1,000,000
Fraction of PCBs	0.0208
Gallons	300
Total Gallons	6.24

## EMRI

### Tank 31

PPM	80.9
Millions	1,000,000
Fraction of PCBs	0.0000809
Gallons	11,128
Total Gallons	0.9002552

### Tank 12

PPM	7.1
Millions	1,000,000
Fraction of PCBs	0.0000071
Gallons	193,884
Total Gallons	1.3765764

### Tank 13

PPM	90
Millions	1,000,000
Fraction of PCBs	0.00009
Gallons	18,496
Total Gallons	1.66464

### Tank 5

PPM	31
Millions	1,000,000
Fraction of PCBs	0.000031
Gallons	19,132
Total Gallons	0.593092

## Salt Lake City

### Tank 26

PPM	33.4
Millions	1,000,000
Fraction of PCBs	0.0000334
Gallons	15,500
Total Gallons	0.5177

## IOI

### Tank 4

PPM	7
Millions	1,000,000
Fraction of PCBs	0.000007
Gallons	17,305
Total Gallons	0.121135

### Tank 5a

PPM	9.6
Millions	1,000,000
Fraction of PCBs	0.0000096
Gallons	13,775
Total Gallons	0.13224

### Tank 6a

PPM	74
Millions	1,000,000
Fraction of PCBs	0.000074
Gallons	13,979
Total Gallons	1.034446

### Tank D3

PPM	17
Millions	1,000,000
Fraction of PCBs	0.000017
Gallons	14,000
Total Gallons	0.238

## Solids

PPM	50
Millions	1,000,000
Fraction of PCBs	0.00005
Gallons	4,923
Total Gallons	0.24615

## Total Gallons

Tank 31	0.9002552
Tank 12	1.3765764
Tank 13	1.66464
Tank 5	0.593092
Tank 4	0.121135
Tank 5a	0.13224
Tank 6a	1.034446
Tank D3	0.238
Tank 26	0.5177
Solids	0.24615
Total	6.8242346

## Gallons Left

Total Gallons	6.24
Minus Total	6.8242346
Remaining	-0.5842346

## Request of Sale of Anacortes Locked Down Used Oil

The following demonstrates that the used oil transferred to the Venoil LLC site in Anacortes, Washington is free of PCBs because the loads following the lock down more than flushed the truck that hauled the material. Also, all loads after the truck had been proposed flushed should be certified clean material ready for sale prior to the truck actually being certified clean from an outside laboratory.

All contaminated and potentially contaminated tanks were locked down on February 17, 2010. A load was received in Anacortes on February 17, 2010 containing 5,584 gallons from ORRCOs Everett facility which was never contaminated.

The three loads following February 17, 2010 that were received in Anacortes totaled 24,457 gallons. The February 18, 2010 load came from the Everett facility totaling 7,781 gallons. The second load was also from Everett on February 25, 2010 containing 8,176 gallons. The third load was shipped from the Fuel Processors, Inc (FPI) facility on February 28, 2010 and contained 8,500 gallons.

40 CFR 761.79(c)(1) states the container had to be flushed with <50 ppm PCBs oil three times. Each rinse must be equal to or greater than 10% of the containers capacity.

Based on the three loads after the lock down date, the truck was flushed with 24,457 gallons. The truck holds 10,000 gallons. 10% of 10,000 equals 1,000 gallons. Based on this logic the truck was flushed over 24 times. Regardless, the truck was still flushed three times with more than 10% of the capacity during each load. A standard tanker truck is self draining. Therefore after a single load, the first being 7,781 gallons which is more than 7 times the 10% flush volume, any PCBs would have been drained out. All three flush loads were hauled back down to the FPI facility for storage.

Anacortes has 55,145 gallons of used oil currently locked down. The first six loads received in Anacortes after the last proposed flush but prior to the truck being certified cleaned totals 56,948 gallons. This more than equals the amount of oil locked down in Anacortes, all of which has tested at non-detect levels of PCBs. Because all contaminated and potentially contaminated tanks were locked down on February 17, 2010, all but two of the nine loads after February 17, 2010 came from sites that were never even contaminated and the truck that hauled the oil was flushed with three loads after February 17, 2010, the loads received in Anacortes could never have been contaminated with PCBs. Therefore the loads received in Anacortes should be certified clean and ready for sale prior to the day the truck was actually certified clean by an outside laboratory.

DATE	TICKET#	SHIP TO	CARRIER	ID#	NAME	ITEM	UNIT	QTY	INVOICE#	UNIT'S	AMOUNT'S	COMMENT
02/02/10	11-10-0202-001	Anacortes, WA	Orco	16225	Venol, LLC	Used Oil	Gal.	4318	0	0.45	1,943.10	
02/04/10	11-10-0204-001	Anacortes, WA	Orco	16225	Venol, LLC	Used Oil	Gal.	8528	0	0.45	3,837.60	
02/09/10	11-10-0209-001	Anacortes, WA	Orco	16225	Venol, LLC	Used Oil	Gal.	2500	0	0.45	1,125.00	
02/11/10	11-10-0211-001	Anacortes, WA	ORRCO	16225	Venol, LLC	Used Oil	Gal.	7980	0	0.45	3,591.00	
02/17/10	11-10-0217-001	Anacortes, WA	Orco	16225	Venol, LLC	Used Oil	Gal.	5584	0	0.45	2,512.80	
02/18/10	11-10-0218-001	Anacortes, WA	Orco	16225	Venol, LLC	Used Oil	Gal.	7781	0	0.45	3,501.45	
02/25/10	11-10-0225-001	Anacortes, WA	ORRCO	16225	Venol, LLC	Used Oil	Gal.	8176	0	0.45	3,679.20	
02/28/10	11-10-0228-001	Anacortes, WA	Orco	16225	Venol, LLC	Used Oil	Gal.	8500	9827	0.45	3,825.00	
02/28/10	11-10-0228-001	Anacortes, WA	ORRCO	16225	Venol, LLC	Used Oil	Gal.	3325	0	0.45	1,496.25	
03/02/10	2-10-0302-001	Ven Oil	ORRCO	16225	Venol, LLC	Used Oil	Gal.	9118	0	0.45	4,103.10	
03/04/10	8-10-0304-001	Anacortes, WA	ORRCO	16225	Venol, LLC	Used Oil	Gal.	7636	0	0.45	3,436.20	
03/19/10	11-10-0319-001	Anacortes, WA	ORRCO	16225	Venol, LLC	Used Oil	Gal.	7742	0	0.45	3,483.90	
03/31/10	11-10-0331-001	Anacortes, WA	ORRCO	16225	Venol, LLC	Used Oil	Gal.	6984	0	0.45	3,142.80	
04/30/10	11-10-0430-001		ORRCO	16225	Venol, LLC	Used Oil	Gal.	22143	0	0.45	9,964.35	
Average Price							Total	Gal.	110315	Sub-Totals	49641.75	